

Slide 1

Once again, welcome to the Webinar entitled Annual Count: Understanding the Process and its Implications.

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NDTAC is funded through the U.S. Department of Education and is housed at the American Institute of research in Washington D.C. John McLaughlin is the Federal coordinator for the Title I, Part D neglected and delinquent program at the U.S. Department of Education. We are very fortunate to have him on the Webinar today. He will provide some introductory remarks in a few minutes.

Just as a reminder, we want to go over our 3 missions with you, before we start the Webinar. One of the first missions is to develop a uniform evaluation data collection model, secondly to provide technical assistance to our primary audience of State N&D Coordinators, as well as stakeholders who may potentially impact the lives of children and youth who are considered at risk for dropping out of school or are in the child welfare or juvenile justice systems.

The third mission for NDTAC is to serve as a facilitator between different organizations and agencies and interest groups to enrich the conversation pertaining to addressing the individual education needs of youth involved in the juvenile justice and neglect systems.

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The webinar will be divided into two sections and will be led by two NDTAC staff members. The first presenter is DeAngela Milligan. DeAngela is a research associate for the Education, Human Development and Workforce program at the American Institute of research. Ms. Milligan conducts research and data analysis related to education and juvenile justice policy issues. She currently works on two federal projects, NDTAC and the National Center for Response to Intervention. She will be providing context around the Annual Count for Subpart 1 programs.

The second presenter is Greta Colombi, who will address Subpart 2 in the Annual Count and pull together some information looking at Annual Count issues in a general overview. She has nearly 15 years of experience in program monitoring and monitoring, and in research and technical assistance in both the education and health and human services fields. She currently leads direct technical assistance provisions for NDTAC, and as part of this role she is a liaison for 18 states in support of the implementation of Title I, Part D, programs.

Ms. Colombi is also currently deputy director of the Safe and Supportive Schools Technical Assistance Center.

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Simon Gonsoulin: Before turning the webinar over to our Annual Count experts at NDTAC, I would like to ask John McLaughlin, our Federal coordinator, to share a few thoughts about our topic today.

John McLaughlin: Welcome everyone to the Webinar. I am pleased that NDTAC is able to produce it on the start of our annual Child Count season, which in some sense starts around September 2 for the local residential institution count, and NDTAC's release of the Annual Count Toolkit. For State and local program contacts, this toolkit will have all of the information and some new checklists organized in one place to guide you in submitting an accurate Child Count. That is important to us because it is very hard to revise counts and reallocate funds on that, both for Title I, Part A and Title I, part D.

Some State Coordinators on this Webinar may know that there has been a long process of review and development of the technical assistance product of the toolkit. I appreciate all the time you put in reviewing earlier versions of the toolkit, and the patience of NDTAC as it went through several reviews in the U.S. Department of Education.

I hope this Webinar and the long anticipated toolkit will provide clarity and needs for those of you responsible for checking and submitting annual neglected and delinquent child counts. Once again, welcome, and thank you.

Simon Gonsoulin: We are glad you could make the call today, we appreciate those comments. Without further delay I will turn this over to our first Annual Count expert, DeAngela Milligan.

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DeAngela Milligan: I would like to welcome everyone, we are excited that you can join us. Today's webinar focuses on the Annual Child Count, which is what the U.S. Department of Education uses to determine the formula count that are used to allocate States' Title I, Part D, funding. During the webinar, we will discuss the Annual Count process and who is eligible to be counted, so if you have any questions that are not directly related to the Annual Count, such as questions about receiving funds, we ask that you submit those questions after the Webinar and we will work with the Department of Education to get your questions addressed.

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As you are conducting the Annual Count, the Center wants you to know that there are resources and support available to you. John McLaughlin, who is our Federal program officer at the U.S. Department of Education, along with Paul Brown at the U.S. Department of Education are points of contacts regarding the Annual Count process.

If you have any questions we also encourage you to contact your NDTAC state liaison.

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In addition to the staff members at the Department of Education and NDTAC, we also have a host of resources available on the Annual Counts page of the NDTAC website, we hope these are useful to you. We have a new toolkit that was posted today, we hope that you like the new work because we worked hard on it. It was a long time coming. We also encourage States, if you have any suggestions for the toolkit, to feel free to e-mail us at ndtac@air.org.

The federal regulations, statute and nonregulatory guidance includes the lion share of the Annual Count requirements, but there are some additional details that are included in the Annual Count survey form from the U.S. Department of Education.

As John mentioned, we hope that the toolkit will help guide you through some of the intricacies of the Annual Count process. For today's presentation I will give you an overview and we will be touching on some of the content that is shared in the toolkit.

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After we have a brief overview of the count process, I will go into subpart 1 and Greta will go into the subpart 2 Annual Count.

For those of you that may not have gone to the Annual Count process before, the importance of the Count is pretty straightforward. The counts you submit to the Department of Education is what they use to determine the funding allocation for each State. It is really important that you make sure that when you submit the Count data to the Department of Education, the counts are accurate and complete.

Historically, the Department of Education releases the Annual Count forms in mid October of each year. Once the forms are released, NDTAC will post them on the Annual Count page of our website.

As you can tell from those of you that have seen the form, the counting procedures for State Agency programs and local educational agency programs are pretty different. If you look at the forms themselves they can actually be a little confusing because part one is for the local education count, part two is for the State Agency count.

The LEA part one of the form, which is for the LEA, is actually in two parts. The first part of the form is for students who are delinquent, this helps allocate funds for the Title I, Part D, program. The second part of the form is for students who are neglected, this helps allocate funds for the Title I, Part A, program.

The second part of the Annual Count form is for the State Agency program; the State Agency counts are used to allocate funds for children and youth who are neglected and delinquent for the Title I, Part D, Subpart 1 program. I want to reiterate how important it is to know that the Annual Count processes are different for the subpart 1 and subpart 2.

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As you can see from the flowchart, this gives you an overview of the annual cycle and what it looks like, I assume most of you are familiar with the cycle by now. Again the Department releases the Annual Count forms typically in mid-October. States will select the count period. Technically states can select their count period before the forms are released, since we know historically they are going to be released in mid-October, states could if they wanted to, in preparation for that release to select their count date earlier.

Then accounts are typically due to the Department of Education in January -- or the week of January 15. Then ED prepares funding tables based on counts and then the funds are made available to States. Lastly ED announces preliminary awards in April or May, and releases the funds in July.

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At the center we often hear a lot of questions around confusion around the counting and funding process. Especially around eligibility to be funded and eligibility to be served. To avoid confusion, we recommend that you completely separate these two administrative processes in your mind, and address and think about counting and funding processes separately.

It is important to note that students included in the Annual Count are most likely different individuals than the students who subsequently benefit from the funding once it is allocated.

You can see in the flow chart on the slide, which uses the 2011 calendar year as an example. When you submit an annual account in January 2011, this includes a subset of students enrolled in the 2010 calendar year. Those counts determine the funding allocation you received last spring, which are being used for school year 2011-12. The students who are enrolled and receiving Title I, Part D services during the 2011-12 school year will be reported in the CSPR in January 2013.

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I'm going to provide a big picture overview of the Subpart 1 Annual Count, before I pass things on to Greta who will be discussing the Subpart 2 Annual Count with you later.

Let's discuss eligibility to participate in Annual Count. It is easiest to think about eligibility for participating in the count by walking through it step by step.

First confirm which State Agencies are eligible. To see if you're eligible to participate in the count, State Agencies need to be responsible for providing free public education to children and youth who are in neglected or delinquent facilities, community day programs, or adult correctional institutions.

If the State Agency is eligible, then you should determine which facilities within that State Agency are eligible to participate in the count. To be eligible for counting for subpart one, you [facility] need to serve students who are neglected or delinquent, and they need to have an average length of stay of at least 30 days.

As defined in section 1432 of the statute, the term 'institution for neglected and delinquent children or youth' is a public or private resident facility other than a foster home that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable state law due to abandonment, neglect, or death of their parents or guardian. Or private or public facility for children that have been adjudicated to be delinquent or in need of supervision.

Once the facility itself meets those criteria, then you may determine which students within a facility are going to be eligible for counting. The students who are eligible are those who are 20 years of age or younger. They are enrolled in a state-funded regular program of instruction for at least 15 hours a week, if in an adult facility or 20 hours per week if in a juvenile facility or community day program.

A facility does not have to determine which students are going to be considered neglected or delinquent. If the facility itself is considered a neglect facility, then all the kids in that facility would be counted as neglected. The same with delinquent facilities.

The definition of a regular program of instruction is an educational program not beyond grade 12 in an institution or community day program for neglected or delinquent children that consists of classroom instruction in basic subjects, such as reading, mathematics and vocational-oriented subjects and it is supported by non-Federal funds.

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Once you determine what agencies, facilities, and students are eligible, each State Agency will need to determine the count period.

Each agency may select its own date, each institution under a particular agency has to use the same counting day. SEAs may choose to try to work with the SEs to select a date to use across State Agencies, but it is not required for State Agencies to use the same date as others State Agencies.

The data itself can be any one day not including weekends or holidays, within the current calendar year. For instance, for this year's count you can select any date between January 1, 2011 through December 31, 2011, that is not a weekend or holiday.

It is up to you which date you use for the Subpart 1 count. I'm assuming many states would not choose a date in December, because the counts are due the week of January 16, so it may be pushing it a little late, if you are collecting data that late.

Once you have counted all of the eligible students on that date, the State Agency needs to adjust the count to reflect the relative length of school year of the State Agencies' program. The count is adjusted by multiplying the total enrollment by the number of days in the year that the educational program operates and then divide that number by 180 to determine adjusted enrollment. The State Education Agencies then combine the State Agency adjusted count for all of their subgrantees, and then complete Section A, Part Two of the Annual Count survey. Then they will certify the data is accurate and complete and simply -- submit to the Department of Education.

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Looking more in depth, the calculation takes into account the relative length of the school year, because some State Agencies may have a longer school year. The average school year is typically 180 days. You can see in this example on the slide that the student count of 100 in a program with 180 days is still 100. If the school year is a little longer, such as 220 days, this will increase the count to 122.

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The following slide is a brief quiz, it is kind of the same quiz we use for the last webinar, it may be familiar, but feel free to play along anyway and test your memory. It is try to test your

understanding of how to select an optional count day for the Subpart 1 agencies. The optimal date would maximize the number of students counted.

The question is, what is the optimal day to choose for the count? The table is divided into the Department of Human Services, with two facilities, and the Department of Corrections, there's just one facility.

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I'm sure all of you were correct, it is pretty simple math. For the Department of Human Services, the correct answer would be September 1 because that date would give you a count of 400, that is the best way to maximize the count of students. For the Department of Corrections, the date with the optional count would be June 15.

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Here I have included some of the questions we've received, regarding the annual account, some of the repeat offenders that we get on an annual basis.

We receive questions about students who have already earned their high school diploma they can be counted. And the answer to that question is no, because they no longer meet the eligibility requirement to, which says that in order to participate they have to be enrolled in a regular program of instruction, and because they have already earned their high school diploma they are no longer enrolled in a program of instruction.

However, as you see on the second bullet, we also get questions about whether or not kids that have earned a GED can be included in a count. Kids who have earned their GED can be included in the Annual Count because they can still be enrolled in a regular program of instruction, so long as they meet the other count requirements. [They must be enrolled in a regular program of instruction to be counted.]

Another question that we get is about students who received instruction from the community day program but do not reside at the community day program. Unlike the local education agency annual counts, there is no residential requirement for the Subpart 1 count. So students who receive instruction in a community program can be included in the Annual Count since there is no annual residency requirement for Subpart 1.

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That wraps up my quick presentation on Subpart 1 and an overview of the Annual Count. We see that a couple of you have asked questions in the Q&A pane.

Question: If the student is enrolled in a GED program and a vocational-oriented program, are they counted once or twice?

Answer: My understanding is that they would just be counted once. For the Subpart 1 count, you are just doing a one-day count, a one-day caseloadcount, so you would just be counting the students in that one program.

Question: This is a question being posed to the Department of Education, I will read the question and then we will see if we can reply in a written response, but the question is why doesn't the US Department of Education move the days several weeks forward to receive the Annual Count from January 15 to January 30, if the Subpart 1 State Agencies can have through December to report their count. In many states there are internal processes for the report to go to before can be submitted to the U.S. Department of Education and several weeks is not ample time to process these internal concerns.

Answer: *John McLaughlin:* I believe when Sandy and I looked at it, it is in the regulations that the count must be submitted in January. I cannot remember if it says the 15th or the 30th, but the if the State is running behind in submitting the State Agency count, they can contact Sandy Brown and ask for an extension.

We wouldn't want everyone asking for an extension, but depending on the circumstance they can contact and ask.

Question: Can a student be enrolled in a local LEA or charter school for services and instruction and a N&D residence program, could they be counted in the N&D residence program?

Answer: They would just be counted in where they are. This is actually an LEA question we will be touching on this in a little bit, but it would be just the facility where the student is residing that would count, not the charter school.

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Greta Colombi: Thank you, now that we have gone through Subpart 1, and we know generally the purpose of the Annual Count, we are going to turn our attention to Subpart 2.

As Dee stated, each year the Annual Count forms are distributed in mid-October and SEAs are responsible for collecting accounts from their grantees, and for Subpart 2 that means collecting counts from eligible local educational agencies. And of course the SEA must complete and submit the forms in January.

The forms for this year's count are not out yet because we are still in September, but the links to those forms will be posted on the Annual Count page of the website when they are available.

Like Dee's steps through eligibility for Subpart 1, I am going to do a similar step-by-step to figure out who is eligible for the count for Subpart 2.

Before counting begins, SEAs should first confirm which LEAs are eligible to be counted. Eligible LEAs are those that serve neglected and delinquent youth not operated by the State, including public and private institutions.

Next eligible LEAs should identify eligible facilities with some support from their SEA if needed. Those eligible facilities include the locally operated facilities that meet the definition of an institution for children and youth who are neglected, delinquent or at-risk, or an adult institution as specified in section 1432 of the statute, which we went over before. Facilities need not have a 30 day average length of stay like Subpart 1.

Finally eligible facilities should identify eligible students, with support from the LEA if needed. LEAs can also ask for support from their SEA, if needed.

Eligible students include kids that are 5 to 17 years old, were not counted in the State Agency Annual Count, and reside a living institution or facility for at least one day within the 30 day count window, one day of which must be in October.

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So once you understand who is eligible to be counted, three steps are needed to be able to perform the count. Since subpart 2 is trickier I'm going to walk you through each step one at a time and give you a quiz after each one. So the first step is for eligible LEAs to select the 30 day count window. The SEAs may decide to help in deciding that window.

What we mean by a 30 day count window is at least one day in the 30 day count period must be in October.

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So to demonstrate what a 30 day count can look like, we have a calendar here. The 30 day calendar for Subpart 2 can start as early as September 2, ending on October 1, or it can start as late as October 31, ending on November 29. Remember the window must be for 30 consecutive days and at least one day must be in October.

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Here is our first quiz, which of the following date ranges are acceptable for the Subpart 2 Annual Count? A - October 1 through October 30; B - September 20 through October 10 and October 20 through November 10; C - October 31 through November 29; D - September 1 through September 30, or E - September 1 through October 1.

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As you can see here, A and C are both acceptable because they include 30 consecutive days where one of which is in October. B is not acceptable because the count window is not consecutive, D is not acceptable because one of the days does not fall in October, and E is not acceptable because the count window is more than 30 days.

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After you have decided on an acceptable count window, the next step is for eligible facilities to count their students. That sounds simple, but there are two important details that complicate this.

First, each eligible facility must be designated as either a neglect or delinquent institution, per the definition included in section 1432 of the Part D statute. And Eligible students must be counted based on where they reside. So if a student who is delinquent was resides in facility designated as a neglect institution, they should be counted as neglected. Or if the student was considered neglected resides in a facility that is designated as a delinquent institution, they should be counted as delinquent.

To determine how a facility should be designated, you should first turn to how it was designated or categorized last year. By doing so, you maintain consistency, which ED prefers so as to not make shifts in the allocation. If the facility has never counted before or its charter has changed his should be designated according to its charter. If the facility's charter does not clearly identify

whether it is a delinquent or neglect institution and they have never counted before, the facility should be designated by its enrollment. In other words, does it serve more students who are neglected or delinquent? And whatever the response is to that is how it should be counted.

The next detail that is important to understand is that the facility should count each unique case or enrollment in its caseload. That is if a student was released, ran into problems and reenrolled, that student should be counted twice. If a student arrived late at night, completed intake with the intention of being enrolled and was transferred within a few hours to another facility, that student can still be counted.

Slide 24:

Since these details are a bit complicated, let's do some quizzes. How many students who reside in the facility that is designated as a neglect institution should be counted?

You should all be looking and thinking about Joe and Kelly if they are considered neglected, and Shawn is considered delinquent, how many students should you count?

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The count to three, Joe, Kelly, and Shawn all resided in the facility designated as a neglect institution during the 30 day count window, even though Shawn is delinquent, he resides in a facility that is neglect he should also be counted.

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How about we do another one with a twist? How many students who reside in this facility that is designated as neglect institution should be counted? This time Joe and Kelly are considered neglected and Shawn is considered delinquent again, so look at the calendar and see how it is different and figure out what you think that count should be.

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On this instance the count is 4. Joe, Kelly and Shawn resided in a neglected facility, like before. But in this scenario, Shawn left and returned. Since you are to count each case, Shawn should be counted twice.

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After the count window and doing the actual count, the final step is for the SEA to combine counts from each LEA and submit those to ED. To ensure it is done right, each LEA should submit to two counts: one that combines eligible students residing in eligible neglect institutions and another for eligible students residing in delinquent institutions.

Then the SEAs rolls the LEA counts and completes section A, part one of the Annual Count survey.

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Let's do one last quiz. How many students who reside in the facility that is designated as a neglect institution should a LEA count?

Look through and think about what the count should be.

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An LEA should count students who reside in the facilities that are designated as neglect institutions, even if they [the students] are not considered neglected. You would add the students in neglect institutions 1 and 2; and not count those in the delinquent institutions, even though the students are neglected and reside there.

So it would be $10+10+20 = 40$.

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Since there are so many details and potential pitfalls, we wanted to draw your attention to the NDTAC's new toolkit, and Tool 2 within it. It includes tips on issues that may need clarification. So here are four common issues that come up.

We often get questions on whether students who change programs within the same facility can be counted. They can only be counted once, as one case. This speaks to the question that we had earlier, if a student is in two programs within a facility, that facility should only count an eligible student only once.

We also hear questions about whether students who were voluntarily placed in a group home can be counted. If the group home fits the definition of an eligible institution for section 1432 of the statute, then Eligible students that reside there can be counted. Note that children and youth residing in neglect institutions can not be counted under the delinquent count in Subpart 2. If students meet the criteria for being reported under the neglected count for Part A funding purposes, then the students may be counted there.

What about students who reside in the county jail, can they be counted? Since it can be considered a juvenile detention center, eligible students can be counted. Please be careful - in some states there is direct SA supervision over all juvenile detention centers and the count would go through Subpart 1 instead.

Finally, we hear that LEA can be resistant to count. While LEAs are not required to count, accurate counts help ensure the LEA receives resources that are sufficient to serve students who are neglected, delinquent or at-risk. Submitting a count does not mean they are required to apply for or receive Part D funding. However, any LEA or SEA submitting a neglect count must ensure that children and youth who are neglected received comparable service through a Title I, Part A reservation.

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We have just gone over lots of details, and to help to put them in perspective I am going to do a quick summary comparing count requirements for Subpart 1 and Subpart 2. Counting and serving requirements for Subpart 1 and Subpart 2. And counting and reporting requirements for Subpart 1 and Subpart 2. I will then walk through some steps you can take to ensure that you are conducting an efficient and accurate count.

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This slide compares counting requirements for Subpart 1 and Subpart 2. For the State Agency count, you will notice that it is supposed to be for youth were neglected and delinquents including juvenile and adult corrections facilities. That is basically the same for subpart 2. What is different is in subpart one, students must be enrolled in a regular program of instruction, and that requirement does not exist in subpart 2.

In subpart one they must be enrolled in a program that has an average length of stay of at least 30 days on the day of counting during the calendar year. Instead, for subpart 2, they must be living in an institution for at least one day during the 30 day count period, and there is no required length of stay.

Finally, for subpart one, it must include students who are 20 years of age or younger, where as for subpart 2 is ages 5 to 17 years of age.

Slide 34:

This slide compares counting and serving requirements for subpart one. Some of these requirements can get confusing and tricky. Counting and serving are different, this helps to demonstrate that. While we are still talking about the same type of students, students are neglected or delinquent in juvenile and adult corrections, and community day programs, etc., those who are counted are in a regular program of instruction when they are being counted and also when they are being served, but there are particular differences.

To be counted, there has to be an average length of stay of 30 days and be counted on that particular day, whereas to be served with funds, it does not have to meet the length of stay, it depends on the different programs. In our Program Administration toolkit, there are some more details on the serving.

Finally, for counting under Subpart 1, you can count students were 20 years of age or younger, but you can serve students through the age of 21.

Slide 35:

This slide compares counting and serving requirements for Subpart 2. You can count and serve students in local institutions for delinquent children and youth or in adult correction institutions. However you can also serve youth under Title I, Part A and C and students who are identified as at-risk, including migrants, immigrants, gang members, pregnant, or parenting youth. You can count students who are 5 to 17 years of age, but you can serve students through the age of 21.

These differences are important. These two slides can be very helpful to post by your desk, if needed.

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Finally, this slide compares counting and reporting generally. The purpose of the Annual Count is to allocate funds, while the purpose of reporting is to track student achievement.

The Annual Count instructions varies by subpart, but the CSPR reporting instructions do not. The amount count counts a subset of students on a particular day for Subpart 1 or during a 30 days count for Subpart 2. But for the CSPR, all students who benefited from or were served by Part D during a particular school year should be counted.

For the Annual Count, the Subpart 1 counts are adjusted to estimate the student population, but for reporting in the CSPR, the unduplicated counts are not adjusted since ED wants the actual count of students served.

For the subpart 2 Annual Count, you count each unique case or multiple enrollments, but for CSPR reporting, students are only counted once, even if they were enrolled at a facility more than once during a school year.

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We hope these final slides helping put the counting requirements in perspective with the reporting requirements, and also to help reiterate what those are.

Now that you understand the purpose and requirements, it is important to take a step back and think about what you can do to ensure an efficient and accurate count. And there are three overarching things you can do.

You can prepare for the count by understanding the purpose of the count and its process. So it is looking to this webinar and in the toolkit there is an introduction with language to help explain. As well, you can plan for the process. So Tool 2 in the toolkit provides a timeline template of each point in the process, and you can use it to schedule what you anticipate doing over the course of the count. And you can develop and update your materials, as mentioned earlier, the materials that are provided by ED rarely change, usually it is simply changing the due date and the official year of the form and all the content stays the same, so you can get a head start and think about what worked last year and how you might be able to make changes for this year, and if everything is working great, then maintain those forms.

The next piece is providing training and technical assistance as appropriate. This item is appropriate at each level, whether it is SEA, or LEA, facility or staff. Ideally, you are working with each other to collect the accounts and explain the requirements. It is helpful. You should be thinking about issues and questions that have come out in the past, think about how you can proactively address them through training, conference calls, phone calls, and think how you can be responsive if people do give you a call or ask questions. Ideally, if you have training and technical assistance materials that you used last year, you can revise them to include some items that are in our toolkit, so that you can help your count be more efficient this year. Based on experience that you had last year, you might know what people respond to better. It is good to take a step back, before everything gets started, to plan that. You should be prepared to address common issues, in Tool 2 in the Annual Count Toolkit, Step 2 goes over what maybe come up and what you can do to address them.

Finally you're going to want to verify and submit the counts. Rather than taking the counts and forwarding them over to ED, it is important to review them more thoroughly and making sure

they include new facilities or how do those compare to the previous year. ED really does look closely to see if the counts vary, and if they do vary, they do get in touch with you and ask what happened. So it's best for each party of the Annual Count to understand what has changed between last year and this year, and to communicate that all along the way from each level. And finally submit the counts with additional information. You can provide information about how things have changed. If some facilities are designated differently and why, you can explain that.

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For additional information, please go to the NDTAC website. This is where you can go once the forms are released, for worksheets and guidance. You can go through a number of NDTAC resources including the slides and recording for this Webinar, which will be posted shortly, and the new toolkit, which we've all been talking about. In addition, you can contact the state liaison, and if you do not know who the liaison is, you can go to the link down here and find your state and see which the liaison is paired up with you.

Slide 39:

We are going to pause and get your questions.

Question: Can a student under the supervision of juvenile facility that is placed in an outside private facility or on-parole supervision, still count even if they are physically located at non-state education agency.

Answer: They should be counted where they are physically located. For instance, an out-of-state student should be counted where they currently reside.

Question: To be eligible for counting, do LEAs actually have to be serving students in a locally run N or D facility or just have them in their borders?

Answer: The facility in which the student resides is the one that counts, so if a student is residing in a facility, but then going to a special community day treatment program, it is the facility who would count, not the community day treatment program. Actually the community day treatment program cannot count, unless the students are residing there.

Question: Students who are counted for Subpart 2 can't be counted under Subpart 1?

Answer: *Greta Colombi:* That's right, we want to avoid double counting of students. It doesn't happen too often because the count dates are different. But it can be tricky, what I've heard is that States will work with institutions that they know that students typically transfer between, if they are Subpart 1 and Subpart 2, to coordinate who will be counting which student. But you are right, they should not be double counted.

John McLaughlin: You mean if a youth ends up in both counts for some reason? I'm sure that would be hard to un-duplicate, what we are checking out at the department is that they are not duplications between children and youth in foster care and those in neglect facilities. I do not know how you could un-duplicated between Subpart 1 and Subpart 2. I think the State Coordinator has more information and can do that.

DeAngela Milligan: The issue they are saying is because youth are so highly transient and the Subpart 1 count is one day and Subpart 2 is a 30 day count, one day of which has to be in October, technically the Subpart 1 count could have been on a day in September or October

when the Subpart 2 count is happening. That is one issue. Another issue is that kids move around. And it would be rare that they might leave a Subpart 1 facility and happen to be counted in the Subpart 1 count while they were at that facility, then they leave and end up in a Subpart 2 facility while the Subpart 2 count is going on. The person who asked the question wants guidance on how to make sure that the double counting is not happening. Would they look at student IDs or student names?

John McLaughlin: I don't think we have a policy that addresses duplication, or un-duplication, of data. The risk is there, but I do not know how great that is, the only unduplication we do is between foster care and neglect.

DeAngela Milligan: For the person that asked the question, there is nothing that says you cannot count in the Subpart 1 facility, if the student then leaves and goes to a Subpart 2 facility and is then counted in that count. My feeling is that they are being served in both facilities then you would want to count them both times because funds are being used both times. As long as there is a separate enrollment.

John McLaughlin: I see your point, to the extent that they are aware that there is duplication, they should be unduplicating. I think it will be very hard to track that kind of duplication. It's rare. I see the argument for the reason they are being served for both programs.

DeAngela Milligan: The person also asked whether they should be requesting student names, I just want to specify that when you submit to the Department, you want to make sure there is no identifiable information, that is for security reasons. I guess at the SEA level they would request whatever information they need that to make sure they count is accurate.

Greta Colombi: Some states collect student IDs to be able to make sure they aren't double counting. They will also collect date of birth to make sure that the student is the appropriate age to be counted. So there is additional information that you can include in your survey to help you ensure that you are counting the appropriate eligible students.

DeAngela Milligan: You also may want to request the entry and exit dates, just to make sure that they are accurate.

John McLaughlin: Actually, I wanted to address something said previously - it is possible to count students residing, but not serve them. But I was just wanted to point out the nuance that SEAs can target the funds to districts where there are higher needs and percentages and numbers, so you can submit smaller counts to increase the total allocation to the State, but not necessarily serve the LEAs or facilities that do meet a minimum threshold, say a minimum bed count of 10 or fewer.

Question: Going to one more question, what is the maximum amount of times you can count a student? If they were in and out of the detention center during the 30 day window, is there a limit to how many times they can be counted?

Answer: There is no limit, it is simply the number of times a student is enrolled. I presume that is a rare occasion, but there is no limit.

Question: We have a question that says is a student is residing in a delinquent facility and is enrolled in a college program or who has finished high school and is not enrolled in school eligible to be counted?

Answer: As I said, for the Subpart 1 Annual Count if a student has finished high school and cannot be included in the Subpart 1 Annual because they no longer fit the eligibility requirements.

For Subpart 2, there is no regular program of instruction requirement; however, the spirit of Title I, Part D is to provide a regular program of instruction. There is no rule against counting the students for Subpart 2.

Question: It also asks if the student was residing in a delinquent facility and enrolled in a college program, I'm assuming if they are enrolled in a college program, unless there is some special program with the high school where they are receiving college credits while still in high school...but if they have actually graduated from high school and enrolled in a college program, then no, they cannot be counted in the Subpart 1 count. But there is not enrollment requirement in the Subpart 2 count.

Thank you to our presenters, Greta, Dee and John. We hope that you have learned more about the Annual Count.